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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
QUAVION BROWN.,
Defendant.

Case No. 2:20-cr-00192-JCM-NJK

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES
(Third Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, Acting United States Attorney, and Stephanie N. Ihler, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for Quavion Brown., that the previously ordered deadline for filing of pretrial motions be vacated and that the parties herein shall have to and including August 3, 2021, within which to file the Defendant's pretrial motions currently due June 2, 2021.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including August 17, 2021, to file any and all responsive pleadings, currently due June 16, 2021.

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they
2 shall have to and including August 24, 2021, to file any and all replies to dispositive motions,
3 currently due June 23, 2021.

4 The Stipulation is entered into for the following reasons:

5 1. Counsel for the defendant needs additional time to review the discovery, discuss
6 the case with her client and determine whether to file a pretrial motion.

7 2. The defendant is not incarcerated and does not object to the continuance.

8 3. The parties agree to the continuance.

9 4. The additional time requested herein is not sought for purposes of delay, but
10 merely to allow counsel for defendant sufficient time within which to review the discovery and
11 to determine whether to file a pretrial motion.

12 5. Additionally, denial of this request for continuance could result in a miscarriage
13 of justice.

14 This is the third stipulation to continue filed herein.

15 DATED this 2nd day of June 2021.

16 RENE L. VALLADARES
17 Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

18 /s/ *Nisha Brooks-Whittington*
19 By _____
20 NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

/s/ *Stephanie N. Ihler*
By _____
STEPHANIE N. IHLER
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
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Case No. 2:20-cr-00192-JCM-NJK

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT, CONCLUSIONS OF LAW

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for the defendant needs additional time to review the discovery, discuss the case with her client, and determine whether to file a pretrial motion.

2. The defendant is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to discuss the proposed resolution with his client.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

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ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including August 3, 2021, within which to file the Defendant's pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including August 17, 2021, to file any and all responsive pleadings.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they shall have to and including August 24, 2021, to file any and all replies to dispositive motions.

DATED June 16, 2021.

James C. Mahan
UNITED STATES DISTRICT JUDGE